

From: [Jay Mazalewski](#)
To: [Domingo, David](#)
Cc: [Mayor Johnson](#); ["Jared Gunderson"](#)
Subject: RE: review of noncompliance reports (City of Driggs, ID wastewater treatment plant, ID0020141)
Date: Friday, December 28, 2018 9:38:50 AM
Attachments: [image001.png](#)
[20181226_EPA Update.pdf](#)

David,

Attached is a letter outlining the activities the City of Driggs has undertaken in the past 15 months in an attempt to comply with our discharge permit. If you have any questions or need additional information, please let me know.

Thank you,
Jay

Jay T. Mazalewski, PE
Director of Public Works

City of Driggs, Idaho | *The Heart of Teton Valley*

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From: Domingo, David <Domingo.David@epa.gov>
Sent: Wednesday, December 26, 2018 11:40 AM
To: 'Jay Mazalewski' <jmaz@driggsidaho.org>
Subject: RE: review of noncompliance reports (City of Driggs, ID wastewater treatment plant, ID0020141)

Jay,

It's been 3 months since our last correspondence so just checking in regarding the status of the upgrades/corrective actions at the plant. Paragraph 3.4 of the compliance order (CWA-10-2018-0206) specifies that the City must provide EPA written notification of the modifications and corrective actions needed at the Facility to achieve compliance with the effluent limits in the Permit within 12 months of the effective date of the order. The order went into effect on April 26, 2018.

Please give me a call or send an email at your earliest convenience.

Thank you.

David

David Domingo | Ground Water Unit | U.S. EPA Region 10
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From: Domingo, David
Sent: Thursday, September 20, 2018 4:44 PM
To: Jay Mazalewski <jmaz@driggsidaho.org>
Subject: review of noncompliance reports (City of Driggs, ID wastewater treatment plant, ID0020141)

Jay,

Thank you for providing an update on the City's efforts to improve the wastewater treatment plant. As we discussed today, I've reviewed several noncompliance reports (November 2017, June 2018, August 2018...) and noticed the following:

1. The November 2017 noncompliance report included the reseeding regiment which provides a better understanding of the City's efforts to achieve compliance.
2. Part III.G.2 of the permit specifies that the noncompliance report must specify c) the estimated time noncompliance is expected to continue if it has not been corrected; and d) steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

The noncompliance reports do not include dates for which the city expects the noncompliance to continue and when the corrective action(s) are planned. For example, the August 8, 2018 noncompliance report lists a number of measures that the city has tried and will continue to address the ammonia exceedances. However, there are no corresponding dates and the results of previous efforts are not specified.

In the brief discussion we had today, you mentioned that the exceptionally high flows in August 2018 lasted for 3-4 weeks and likely due to inflow/infiltration. There were ~ 6 major spots in the collection system that were addressed and by mid-August, the flows were under control (< 400 gallons/min?) and the City was reseeding the east basin 1-2 times/week and was fully nitrifying the wastewater. The west basin had achieved 50% nitrification without reseeding. The previous bioassay work to confirm if the wastewater in the lagoon was toxic and negatively impacting the plant's nitrification capability was completed and demonstrated there was no negative effect. The city was planning to conduct additional analyses to determine if nitrification inhibitors (e.g. pesticides) are present.

This level of detail is required by the permit and is critical to ensure that anyone reading these reports will have a better understanding of the length of time noncompliance may/did occur as well as the timeline for measures taken and planned by the city to address the noncompliance.

If you choose, you can also refer to the current compliance order (CWA-10-2018-0206) and the

corresponding deadlines in Part III of the order. The order does not supersede the permit but may provide further clarification to folks reading the noncompliance reports.

If you have any questions, please don't hesitate to contact me.



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